

FILED

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**
Alexandria Division

2015 AUG 17 P 12:10

CLERK US DISTRICT COURT
ALEXANDRIA, VIRGINIA

Reniece L. W. Kabando, Individual
and d/b/a Extended Services,
Plaintiff

v.

Case No.: 1:15CV1040

The United States of America,
Defendant.

JCC/JFA

DECLARATORY AND INJUNCTIVE COMPLAINT FOR RELIEF

COMES NOW, Reniece L. W. Kabando pursuant 42 U.S.C. § 1983 and civil action for depriving of right for housing/Accommodations regarding individuals with disabilities. I seek the court to declare her right for housing/accommodations, the right to seek redress for law assistance, and the right to equality of other upright citizens. In that, She has been deprived of housing and law assistance. Such that, I come before the court as homeless and as pro se. Due to my disability, it is hoped that this court will not deny my complaint upon inability to communicate properly. Whereas, I seek an injunction upon public interest.

Jurisdiction

The district courts shall have original jurisdiction of all civil actions arising under the Constitution, laws, or treaties of the United States 28 U.S.C. §1331. In which, this civil action is arising under the Constitution, violations of the 5th and 14th Amendment.

Background

Reniece Kabando is the Plaintiff. I am located homeless with a mailing address: 5868 Mapledale Plaza #237, Woodbridge, Virginia 22193(Attachement 1). My daughter and I living accomodations are unsuitable for humans. We are American Citizens. The Defendant is the United States of America. Where the focal address is United States Attorney for the Eastern District of Virginia, Justin W. Williams United States Attorney's Building, 2100 Jamieson Ave, Alexandria, VA 22314.

Entitlement for Relief

On June 16, 2014, I was called off the waiting list for entitlement of Section 8 Housing Voucher given by United States Department of Housing and Urban Development (HUD) in Prince William County – Special Needs Division for people with disabilities that are not elderly. However, then deprived of such entitlement without just compensation on October 30, 2014 (Attachment 2). HUD states the vouchers were leased by the contract date of October 27, 2014. "As of the date of letter we have fully lease all the required vouchers and cannot assist anymore families; therefore, Reniece Kabando will be placed back on the waiting list."

According to the 5th Amendment of the United States Constitution, no person shall be ... deprived of life, liberty, or property, without due process of law; nor shall private property be taken for public use, without just compensation. In addition, Section 1 of the United States Constitution 14th Amendment: All persons born or naturalized in the United States, and subject to the jurisdiction thereof, are citizens of the United

States and of the state wherein they reside. No state shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any state deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws. The U.S. Supreme Court is more likely to find due process violations where the actions of a government are clearly arbitrary. In *City of Chicago v. Morales*, 527 U.S. 41, 119 S. Ct. 1849, 144 L. Ed. 2d 67 (1999). In this case, it is clear that the government actions are arbitrary because the office called me off the waiting list to give the funds, then deprived me of funds and take funds for public use without just compensation. In addition, the expiration date was not readily available to the Plaintiff. Not to mention, on October 14, 2014, I verified all required documentations based on my disability well before the expiration date (Attachment 3). Whereas, the government actions are clearly arbitrary.

Request


The type of harm in this case has no monetary compensation to be cured or put conditions back the way they were because it is an irreparable injury. Reniece Kabando has been shunned (avoided, ignored, rejected, abused, belittled, and etc. throughout the American Society (including millions of people) as homeless, lazy, depressed, pittiful, wrong, stupid, risk of danger, and etc . With such a great amount of people participating in the harm if not awarded compensation, her child and she will continue to suffer.

Wherefore, Reniece Kabando seeks compensation of \$92,233,720,368,547,800 not for rebellion against the United States but to be included in the United States as an

upright citizen for a business endeavor. As considered a company called "PayPal" is an upright citizen and has \$92,233,720,368,547,800 in their account (Attachment 4), Reniece Kabando also seeks the same amount for the right to equality. However, as the court deems fit, if it finds obscenity.

Date: 8-17-15

I ask for this:


Reniece Kabando, Pro se
5868 Mapledale Plaza #237
Woodbridge, Virginia 22193
renieced@hotmail.com
(703) 956-0654

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing "Declaratory and Injunctive Complaint for Relief" has been sent via prepaid mail this August 17, 2015 to the above addressee to below address:

Justin W. Williams
Attention: Dana J. Boente
United States Attorney's Building
2100 Jamieson Ave
Alexandria, VA 22314



Reniece L. W. Kabando

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

Reniece L.W. Kabamola
Plaintiff,

v.

Civil Action No.

The United States of America
Defendant.

CERTIFICATION

I declare under penalty of perjury that:

No attorney has prepared, or assisted in the preparation of this document.

Reniece Kabamola
Name of *Pro Se* Party (Print or Type)

[Signature]
Signature of *Pro Se* Party

Executed on: 8-17-15 (Date)

OR

(Name of Attorney)

(Address of Attorney)

(Telephone Number of Attorney)

Prepared, or assisted in the preparation of, this document.

(Name of *Pro Se* Party (Print or Type)

Signature of *Pro Se* Party

Executed on: _____ (Date)